

## **LAW OFFICE OF KATHLEEN J. HILL**

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### **FAX COVER SHEET**

DATE: July 25, 2005  
TO: Leah M. Moore  
FAX: (617) 367-3125  
FROM: Kathleen J. Hill  
TELEPHONE: (617) 742-0457

TOTAL PAGES NOT INCLUDING FAX COVER SHEET: 2 pages

#### **MESSAGE:**

Letter requesting copy of Motion and removal of Motion/Exhibits from Docket/Pacer.

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By Facsimile and U.S. Mail

July 25, 2005

Keith B. Muntyan, Esq.  
Leah M. Moore, Esq.  
Morgan, Brown & Joy, L.L.P.  
200 State Street, 11<sup>th</sup> Floor  
Boston, MA 02109-2605

Re: Griffith v. OneBeacon Insurance Company, et. al.  
Docket No. 03-CV-12573 EFH

Dear Counsel:

I write to inform you that I still have not received a copy of your Motion for Summary Judgment in the above-referenced matter; nor have I been able to download the Motion due to the size and the slow-speed access of pacer. My client called me shortly after 12:00PM today to inform me that she viewed the Exhibits on pacer (which took an entire day) and discovered that you have published Ms. Griffith's personal identification information subjecting her to identify theft. Ms. Griffith informed me that you have published her: social security number, residential address, husband's work address, Lahey clinical identification numbers, and confidential medical and psychologist records. I specifically objected during Ms. Griffith's deposition to the publication of her social security number. In addition, on February 21, 2005 I wrote you a letter advising you not to publish Ms. Griffith's identification information and confidential information. *See attached February 21, 2005 letter to Leah M. Moore.*

I request that you immediately serve me with a copy of the Motion and Exhibits in hand today at my office (which is down the street from you) and file an emergency motion to remove the motion and exhibits from the docket/pacer.

Very truly yours,

  
Kathleen J. Hill

cc: Senior Justice Edward F. Harrington (by facsimile)  
Ms. Bernadine T. Griffith

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By Facsimile (letter only) and by hand

February 21, 2005

Leah M. Moore, Esq.  
Morgan, Brown & Joy, L.L.P.  
200 State Street, 11<sup>th</sup> Floor  
Boston, MA 02109-2605

Re: Griffith v. OneBeacon Insurance Company, et. al.  
Docket No. 03-CV-12573 EFH

Dear Attorney Moore:

I enclose copies of documents produced in satisfaction of defendant's document request number 26 and 27 (income and benefits documentation) and number 30 (e-mails), as bates stamped P260 - P 514.

Many of the documents produced to you during the course of discovery pertaining to Ms. Griffith and Mr. Freeman contain their social security numbers or other confidential financial information and identification information. As you know, the local rules specifically bar the publication of social security numbers in all filings and, therefore, you should not publish any of Ms. Griffith's financial information or other identification information, including her birth date and address.

Also, I request you provide me with the original signature page to OneBeacon American Insurance Company's Answer to Plaintiff's First Set of Interrogatories, dated February 15, 2005. I notice that its answers are the same as OneBeacon Insurance Company's answers. I direct the same requests that I made to you in our discovery conferences and my letters concerning OneBeacon Insurance Company's failure to answer Plaintiff's interrogatories and to produce documents to OneBeacon American Insurance Company. OneBeacon American Insurance Company still needs to respond to Plaintiff's Request for Production of Documents.

Very truly yours,

  
Kathleen J. Hill

cc: Ms. Bernadine T. Griffith